

Joseph G. Petrosinelli, *pro hac vice*  
Ashley W. Hardin, *pro hac vice*  
WILLIAMS & CONNOLLY LLP  
680 Maine Avenue, SW  
Washington, DC 20024  
Telephone: +1 (202) 434-5000  
jpetrosinelli@wc.com  
ahardin@wc.com

*Attorneys for Defendants YouTube, LLC and  
Google LLC*

*Additional parties and counsel listed on  
signature pages*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

*The School Board of Hillsborough County, Florida  
v. Meta Platforms, Inc., et al.*, No. 24-cv-01573

*Board of Education of Jordan School District v.  
Meta Platforms, Inc., et al.*, No. 24-cv-01377

*Tucson Unified School District v. Meta Platforms,  
Inc., et al.*, No. 24-cv-01382

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

Judge: Hon. Yvonne Gonzalez Rogers

**STIPULATION EXTENDING TIME  
TO FILE OMNIBUS SEALING  
STIPULATION AND/OR MOTION  
REGARDING DEFENDANTS'  
MOTION TO PRECLUDE  
PLAINTIFFS FROM RELYING ON  
LATE-DISCLOSED SCHOOL  
DISTRICT WITNESSES**

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), the Parties submit this stipulation extending the time to make an omnibus sealing filing.

On May 9, 2025, Defendants Meta Platforms, Inc. f/k/a Facebook, Inc., Facebook Holdings, LLC, Facebook Operations, LLC, Facebook Payments, Inc., Facebook Technologies, LLC, Instagram, LLC, and Siculus, Inc.; TikTok Inc., ByteDance Inc., ByteDance Ltd., TikTok Ltd., and TikTok LLC; Snap Inc.; and YouTube, LLC, Google LLC, and Alphabet Inc. (each a

1 “Defendant,” and collectively the “Defendants”) filed Defendants’ Motion to Preclude Plaintiffs  
 2 from Relying on Late-Disclosed Witnesses. (ECF Nos. 1951, 1952). Defendants filed a  
 3 temporary sealing motion pursuant to ECF No. 341 regarding material in the motion. (ECF No.  
 4 1952). Briefing concluded on the Motion on May 30, 2025.

5 Section II.C of the Court’s Order Setting Sealing Procedures permits the Parties, by  
 6 stipulation, to extend the time to file an Omnibus Stipulation or Omnibus Motion to 21 days after  
 7 the conclusion of briefing. The Parties agree that extending the time to make the omnibus filing  
 8 is appropriate.

9 Accordingly, the Parties stipulate that the deadline to file an Omnibus Stipulation and/or  
 10 Omnibus Motion is extended to June 20, 2025.

11 **IT IS SO STIPULATED AND AGREED**, through the Counsel of Record.

12 Dated: June 13, 2025

Respectfully submitted,

14 COVINGTON & BURLING LLP

15 /s/ Ashley M. Simonsen

Ashley M. Simonsen, SBN 275203

16 COVINGTON & BURLING LLP

17 1999 Avenue of the Stars

Los Angeles, CA 90067

18 Telephone: (424) 332-4800

Facsimile: + 1 (424) 332-4749 Email:

19 asimonsen@cov.com

20 Paul W. Schmidt, *pro hac vice*

pschmidt@cov.com

21 Phyllis A. Jones, *pro hac vice*

pajones@cov.com

22 Christian J. Pistilli, *pro hac vice*

cpistilli@cov.com

23 COVINGTON & BURLING LLP

24 One CityCenter

850 Tenth Street, NW

25 Washington, DC 20001-4956

26 Telephone: + 1 (202) 662-6000

1 Emily Johnson Henn (State Bar No. 269482)  
ehenn@cov.com  
2 COVINGTON & BURLING LLP  
3 3000 El Camino Real  
5 Palo Alto Square, 10th Floor  
6 Palo Alto, CA 94306  
7 Telephone: + 1 (650) 632-4700

8 *Attorneys for Defendants Meta Platforms, Inc. f/k/a*  
9 *Facebook, Inc.; Facebook Holdings, LLC; Facebook*  
10 *Operations, LLC; Facebook Payments, Inc.;*  
11 *Facebook Technologies, LLC; Instagram, LLC; and*  
12 *Siculus, Inc.*

13 KING & SPALDING LLP

14 /s/ Geoffrey M. Drake  
15 Geoffrey M. Drake, *pro hac vice*  
16 TaCara D. Harris, *pro hac vice*  
17 KING & SPALDING LLP  
18 1180 Peachtree Street, NE, Suite 1600  
19 Atlanta, GA 30309-3521  
20 Telephone: (404) 572-4600  
21 Facsimile: (404) 572-5100  
22 Email: gdrake@kslaw.com  
23 tharris@kslaw.com

24 David P. Mattern, *pro hac vice*  
25 KING & SPALDING LLP  
26 1700 Pennsylvania Avenue, NW, Suite 900  
27 Washington, DC 20006-4707  
28 Telephone: (202) 737-0500  
Facsimile: (202) 626-3737  
Email: dmattern@kslaw.com

Bailey J. Langner (SBN 307753)  
KING & SPALDING LLP  
50 California Street, Suite 3300  
San Francisco, CA 94111  
Telephone: (415) 318-1200  
Facsimile: (415) 318-1300  
Email: blangner@kslaw.com

FAEGRE DRINKER BIDDLE & REATH LLP

/s/ Andrea Roberts Pierson

Andrea Roberts Pierson, *pro hac vice*  
andrea.pierson@faegredrinker.com  
FAEGRE DRINKER BIDDLE & REATH LLP  
300 North Meridian Street, Suite 2500  
Indianapolis, IN 46204  
Telephone: + 1 (317) 237-0300

Amy Fiterman, *pro hac vice*

amy.fiterman@faegredrinker.com  
FAEGRE DRINKER BIDDLE & REATH LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Telephone: + 1 (612) 766-7000

*Attorneys for Defendants TikTok Inc., ByteDance  
Inc., ByteDance Ltd., TikTok Ltd., and TikTok, LLC*

MUNGER, TOLLES & OLSON LLP

/s/ Jonathan H. Blavin

Jonathan H. Blavin (State Bar No. 230269)  
Jonathan.Blavin@mto.com  
MUNGER, TOLLES & OLSON LLP  
560 Mission Street, 27th Floor  
San Francisco, CA 94105-3089  
Telephone: +1 (415) 512-4000

Victoria A. Degtyareva (State Bar No. 284199)

Victoria.Degtyareva@mto.com  
Rowley Rice (State Bar No. 313737)  
Rowley.Rice@mto.com  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
Telephone: +1 (213) 683-9100

Stephany Reaves, *pro hac vice*

Stephany.Reaves@mto.com  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Avenue NW, Suite 500 E  
Washington, D.C. 20001-5369  
Telephone: +1 (202) 220-1100

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

Laura Bernescu, *pro hac vice*  
Laura.Bernescu@skadden.com  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
320 South Canal Street  
Chicago, IL 60606  
Telephone: +1 (312) 407-0709

KIRKLAND & ELLIS LLP

Jessica Davidson, *pro hac vice*  
Jessica.Davidson@kirkland.com  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
Telephone: +1 (212) 446-4723

*Attorneys for Defendant Snap Inc.*

WILLIAMS & CONNOLLY LLP

/s/ Ashley W. Hardin  
Joseph G. Petrosinelli, *pro hac vice*  
jpetrosinelli@wc.com  
Ashley W. Hardin, *pro hac vice*  
ahardin@wc.com  
WILLIAMS & CONNOLLY LLP  
680 Maine Avenue, SW  
Washington, DC 20024  
Telephone: +1 (202) 434-5000

*Attorneys for Defendants YouTube, LLC and Google  
LLC*

/s/ Austin Brane  
Austin Brane, SBN 286227  
Thomas P. Cartmell (*pro hac vice*)  
Jonathan P. Kieffer (*pro hac vice*)  
WAGSTAFF & CARTMELL LLP  
4740 Grand Avenue, Suite 300  
abrane@wcllp.com

1 Kansas City, MO 64112  
2 Tel: (816) 701-1100  
3 tcartmell@wcllp.com  
4 jpkieffer@wcllp.com

5 Joseph G. VanZandt (*pro hac vice*)  
6 Davis Vaughn (*pro hac vice*)  
7 James Lampkin (*pro hac vice*)  
8 BEASLEY ALLEN CROW METHVIN PORTIS  
9 & MILES, P.C.  
10 234 Commerce Street  
11 Montgomery, AL 36103  
12 Tel: 334-269-2343  
13 Joseph.VanZandt@BeasleyAllen.com  
14 Davis.Vaughn@BeasleyAllen.com  
15 James.Lampkin@BeasleyAllen.com

16 Kirk J. Goza (*pro hac vice*)  
17 Brad Honnold (*pro hac vice*)  
18 GOZA & HONNOLD LLC  
19 9500 Nall Ave., Ste 400  
20 Overland Park, KS 66207  
21 Tel. (913) 451-3433  
22 kgoza@gohonlaw.com  
23 bhonnold@gohonlaw.com

24 *Counsel for Plaintiffs The School Board of*  
25 *Hillsborough County, Florida, Board of Education*  
26 *of Jordan School District, and Tucson Unified*  
27 *School District*  
28

**LOCAL RULE 5-1 ATTESTATION**

I, Joseph Sandoval-Bushur, hereby attest in accordance with Local Rule 5-1 that each signatory has concurred in the filing of the document.

Dated: June 13, 2025

By: /s/ Joseph Sandoval-Bushur  
Joseph Sandoval-Bushur, *pro hac vice*

*Attorneys for Defendants YouTube, LLC and Google LLC*